

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL 13 2022

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) NO.
v.)
)
CAMERON MCGHEE,)
)
Defendant.)

4:22CR396 CDP/SRW

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Christine Krug, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is charged with three counts of Cyberstalking, in violation of 18 U.S.C. §2261A(2), an offense for which a maximum of five years imprisonment for each count is prescribed under Title 18.
2. Upon motion of the attorney for the government, a detention hearing shall be held when the case involves a crime of violence pursuant to 18 U.S.C. §3142(f)(1)(A). The elements of the crime charged herein include that the Defendant acted with the intent to kill, injure, harass, and intimidate another person. As defined in 18 U.S.C. §3156(a)(4)(A), a crime of violence is an offense that has an element of the offense the use, attempted use, or threatened use of physical force against the person or property of another. As detailed

below, the Defendant clearly threatened the use of physical force against others.

3. According to the United States Air Force Office of Special Investigations and the Federal Bureau of Investigation, between the dates of June 23, 2022 and July 5, 2022, the Defendant sent threatening text messages to at least three people from his cellular telephone. Over 20 of those messages threaten to kill or seriously assault the receiver and/or others, including at least one named member of local law enforcement. Examples include the following texts:

- a. "I should have killed all of you when you were all in one place"
- b. "And you tell N. if he was higher on my list i would go to Ohio to see his family"
- c. "Im looking for hard targets not soft"
- d. "I think about killing your famiky"
- e. "I think about going out to scott"
- f. "Killing people in the sfs building"
- g. "I think about it alot"
- h. "I kill people who follow me"
- i. "I should kill your wife"
- j. "Then I'll call the police"
- k. "YOU FUCKER"
- l. "I'LL KILL YOU"
- m. "Then im going tto shoot up ucpd"
- n. "And you tell chief c. I'll burn her house down"
- o. "And im goingnto go to home depot and build a pipe bomb"

4. In the alternative, a detention hearing shall also be held under 18 U.S.C. §3142(f)(1)(E)

for any felony that is not otherwise a crime of violence that involves a minor victim. Many of the text messages sent by the Defendant threatened the lives of two of the recipients' children. Examples of these texts include:

- a. "Remember im gonna kill one of your kids"
 - b. "I'll kill your kids"
 - c. "I'll mutilate your kids"
 - d. "Or ima kill one of your kids"
 - e. "I'm going to kill all your kids and your wife"
 - f. "I think about killing your family"
5. The recipients of these text messages were people known to the Defendant from his time as an active member of the United States Air Force. He separated from the USAF in August 2019, almost three years ago.
 6. Based on firearms registrations and videos posted by the Defendant to his YouTube profile, he has owned at least four firearms: two revolvers and two semi-automatic firearms. The Defendant was an armed services member who is trained in the use of firearms.
 7. While the Defendant does not have any criminal convictions, a prior contact with law enforcement resulted in criminal charges of the felonies of Making Terrorist Threats and Harassment, and the misdemeanor of Violation of an Order of Protection.
 8. Those charges were dismissed when the State's witness, the Defendant's mother, did not appear for preliminary hearing.
 9. While on bond for the above-referenced state case, the Defendant was ordered to participate in the EHawk RePath Monitoring Program. During the five months that the Defendant was on bond with that condition he received two violation reports for failing to

participate as directed.

10. As of the date of the filing of this motion, local, state, and federal law enforcement have been unable to ascertain the location of the Defendant.
11. There is a serious risk that the Defendant will flee, given his previous failure to comply with conditions of bond in state court, the potential sentences that the defendant faces, and the strength of the evidence in this case.
12. The nature and circumstances of the offenses charged reflect that a serious danger to the community would be posed by the defendant's release. As such, there are no conditions or combination of conditions that will reasonably assure the Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Christine Krug
CHRISTINE KRUG, #42586MO
Assistant United States Attorney